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June 5, 1996

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JUN 5 1996

Federal Communications Commission
Office of Secretary

HAND-DELIVERED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Ex Parte Presentation in PR Docket No. 89-552;
GN Docket No. 93-252 and PP Docket No. 93-253

Dear Mr. Secretary:

On June 5, 1996, Mr. David Thompson, Chairman and Chief Executive Officer of SEA Inc., made a written ex parte presentation to the following:

Chairman Hundt
Commissioner Quello
Commissioner Ness
Commissioner Chong
Wireless Bureau Chief - Michele Farquhar
General Counsel - William Kennard

A copy of the presentation, consisting of a letter dated June 3, 1996, is enclosed.

In accordance with Section 1.1206 of the Commission's Rules, an original and one copy of this letter and the enclosure are being filed with your office.

Any questions concerning this matter, should be directed to the undersigned.

Sincerely,



Thomas J. Keller
Counsel for SEA Inc.

Enclosure



A UNIT OF DATAMARINE INTERNATIONAL, INC.

June 3, 1996

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JUN 5 1996

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Dear Chairman Hundt,

An Ex Parte filing regarding Docket 89-552 was submitted 16 May, disclosing a meeting on that date between Leonard Kolsky, Motorola, their counsel Michael Lewis and Ms. Jackie Chorney of your office.

The main thrust of the meeting was that Motorola would participate as a manufacturer in the 220 radio service if the R&O in this Docket is written to allow the aggregation of contiguous 5KHz channels to permit the use of wider bandwidth technologies. The reasoning used to support that approach, as well as Motorola's historical view of narrowband, has caused SEA to submit these comments so that the Commission has a balanced perspective of Motorola's position.

Motorola states that 220MHz is technically isolated from the 150 MHz and 450MHz private radio bands. The term "isolation" implies some unfortunate condition of inequality for 220MHz. The isolation in reality is that of Motorola, who has consistently refused to participate in narrowband (5KHz), now finds itself isolated, both from a marketing and technical sense, from a radio service that is filling a very real need. Motorola has, for 18 years since 1978 UHF Task force recommendations, fought tooth and nail against the implementation of narrowband for improved spectrum efficiency at any frequency. Similarly, in their comments which created the service rules for 220MHz in Docket 89-552, they strongly opposed the implementation of 5KHz channels. The reason for selecting 5KHz channels was fully developed in the Commission's R&O for this Docket.

Motorola's comments regarding economies of scale imply that with wideband radios larger production requirements will result. This proposition completely ignores the fact that more production of 5KHz radios will be equally possible once the Commission allows this Service to develop. For approximately five years there has been an almost total freeze on license issuance at 220, and those that are issued represent only a modest portion of the total potential for the service. SEA states, as it has repeatedly, there is nothing inherently more costly about 5KHz product at volumes equivalent to other technologies. Motorola offers no substantive promise that wideband technologies will be

Chairman Hundt
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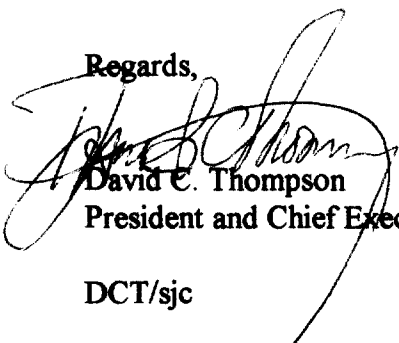
either less expensive, at least as spectrally efficient, or offer equal audio quality to 220 product. Indeed, if the infrastructure cost, subscriber unit and monthly service costs, audio quality and spectral efficiency of Motorola's 800 wideband ESMR technology is an example of what they have in mind, the Commission is being misled.

Essentially, by raising unsupported justification for change, Motorola is saying, "Do it our way or we won't play." That such a strategy exists is unquestioned since there have been endless statements by management at all levels of responsibility at Motorola, for at least five years, that they will not develop 5KHz product.

There is a long record, 10 years, of Commission commitment to the public, the SMR industry and the federal judiciary that the Commission supports 5KHz and that a 5KHz service is needed. Companies such as SEA relying on that have developed equipment which justifies the Commission's vision. The Commission's overwhelming message is, "Let the market decide," and it is deciding. The evidence of this is found in the increasing number of mobile dispatch users who are foregoing the opportunity to pay for much more expensive 800MHz wideband technology and migrating to 220MHz.

The 220 radio service does not need to be saved by Motorola. They should commit funds, design products, enter 220 as others have under the present rules and then let the market decide.

Regards,



David E. Thompson
President and Chief Executive Officer

DCT/sjc

cc: Commissioner James Quello
Commissioner Susan Ness
Commissioner Rachelle Chong
Bureau Chief- Michele Farquhar
General Counsel- William Kennard